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April 3, 2013

By Electronic Mail and By Hand

Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: In re Motors Liquidation Company, Case No. 09-50026 (REG): Official Committee of Unsecured Creditors' First Amended Objection to Claims Filed by Green Hunt Wedlake, Inc. and Noteholders of General Motors Nova Scotia Finance Company and Motion for Other Relief (Docket No. 7859)

Motors Liquidation Company GUC Trust v. Appaloosa Investment Ltd. Partnership I, et al., Adv. Pro. No. 12-09802

New GM Administrative Claim Hearing – April 4, 2013 (Adjourned Sine Die)

Dear Judge Gerber:

I am writing concerning my April 1, 2013 letter to Your Honor in response to the April 1, 2013 letter written to Your Honor by Mr. Steinberg of King & Spalding LLP (the “New GM Letter”), counsel to New GM, requesting an adjournment of the scheduled April 4th hearing to consider the pending objection of the GUC Trust to New GM’s administrative expense claim. By memo endorsement dated April 2, 2013, Your Honor granted New GM’s request for an adjournment. Your Honor prefaced his ruling by stating, “[w]ithout in any way endorsing the timing of New GM’s request...”

Having suggested (in my April 1st letter) that the timing of the New GM Letter was “troubling,” I thought it would be unfair to leave Your Honor with the impression that the New GM Letter was timed to disadvantage the GUC Trust and, more particularly, its lawyers at my firm who were observing the final days of Passover, when I have concluded that it was not.

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I had occasion to speak with Mr. Fisher this morning when he returned to the office about his conversations with Mr. Steinberg since mid-March about adjourning the April 4th hearing. Based upon my discussion with Mr. Fisher and my long term relationship with Mr. Steinberg, I am convinced that the timing of the New GM Letter was nothing more than an unfortunate coincidence.

Thank you for your time and consideration.

Respectfully,

/s/ Barry N. Seidel

Barry N. Seidel

cc: Arthur Steinberg
Bruce Zirinsky
Sean O'Donnell
Steven Reisman